

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION**

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

MDL No. 17-2795 (MJD/KMM)

**DECLARATION OF SARAH M.
LIGHTDALE IN SUPPORT OF
DEFENDANTS' MOTION FOR
PROTECTIVE ORDER REGARDING
PLAINTIFFS' THIRD-PARTY
SUBPOENAS**

Oral Argument Requested

I, Sarah M. Lightdale, hereby declare as follows:

1. My name is Sarah M. Lightdale and I am a Partner with the law firm of Cooley LLP. I am a member in good standing of the bar of New York.
2. I serve as counsel to Defendants CenturyLink, Inc., Glen F. Post, III, R. Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey in this matter.
3. I respectfully submit this declaration pursuant to 28 U.S.C. § 1746 in order to transmit to the Court certain documents referenced in Defendants' Memorandum of Law in Support of Defendants' Motion for Protective Order Regarding Plaintiff's Third-Party Subpoenas filed concurrently herewith.
4. I have personal knowledge of the facts set forth in this Declaration.
5. Attached as **Exhibit 1** is a true and correct copy of Plaintiffs' Third-Party Subpoena to Afni, Inc., issued on June 11, 2020.

6. Attached as **Exhibit 2** is a true and correct copy of Plaintiffs' Third-Party Subpoena to Allied Interstate LLC, issued on June 11, 2020.
7. Attached as **Exhibit 3** is a true and correct copy of Plaintiffs' Third-Party Subpoena to Amalgamated Credit Bureau, issued on June 11, 2020.
8. Attached as **Exhibit 4** is a true and correct copy of Plaintiffs' Third-Party Subpoena to Audit Systems, Inc., issued on June 11, 2020.
9. Attached as **Exhibit 5** is a true and correct copy of Plaintiffs' Third-Party Subpoena to Convergent Outsourcing, Inc., issued on June 11, 2020.
10. Attached as **Exhibit 6** is a true and correct copy of Plaintiffs' Third-Party Subpoena to EOS-CCA, issued on June 11, 2020.
11. Attached as **Exhibit 7** is a true and correct copy of Plaintiffs' Third-Party Subpoena to GC Services Limited Partnership, issued on June 11, 2020.
12. Attached as **Exhibit 8** is a true and correct copy of Plaintiffs' Third-Party Subpoena to IC System, Inc., issued on June 11, 2020.
13. Attached as **Exhibit 9** is a true and correct copy of Plaintiffs' Third-Party Subpoena to Robinson, Reagan & Young, PLLC, issued on June 11, 2020.
14. Attached as **Exhibit 10** is a true and correct copy of Plaintiffs' Third-Party Subpoena to Southwest Credit Systems, L.P., issued on June 11, 2020.
15. Attached as **Exhibit 11** is a true and correct copy of Plaintiffs' Third-Party Subpoena to Great Place to Work Institute, Inc., issued on June 11, 2020.

16. Attached as **Exhibit 12** is a true and correct copy of Defendants' Responses and Objections to Plaintiffs' First Set of Requests for Production, dated October 4, 2019. This document has been filed with the Court under seal.

17. Attached as **Exhibit 13** is a true and correct copy of an Email dated January 27, 2020 from B. Koch to J. Tebor *et al.*, attaching Revised Search Criteria. This document has been filed with the Court under seal.

18. Attached as **Exhibit 14** is a true and correct copy of an Email dated December 18, 2019 from J. Tebor to B. Koch *et al.*, attaching Proposed Search Criteria. This document has been filed with the Court under seal.

19. Attached as **Exhibit 15** is a true and correct copy of a document produced by Defendant CenturyLink, Inc. in this case, and bearing the Bates number CTLMNSEC00846141. This document was designated Confidential under the October 19, 2019 Protective Order entered in this action and has been filed with the Court under seal.

20. Attached as **Exhibit 16** is a true and correct copy of excerpts of the transcript from the October 1, 2019 Pretrial Conference in this case.

21. Attached as **Exhibit 17** is a true and correct copy of excerpts of the transcript from the June 25, 2020 informal dispute resolution hearing in this case.

22. Attached as **Exhibit 18** is a true and correct copy of Plaintiffs' First Requests for Production, dated September 4, 2019. This document has been filed with the Court under seal.

23. Attached as **Exhibit 19** is a true and correct copy of excerpts of the transcript from the April 27, 2020 hearing on Plaintiffs' motion to compel in this case.

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Executed this 16th day of July, 2020, in New York, NY.

/s/ Sarah M. Lightdale

Sarah M. Lightdale